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March 10, 2021

**By ECF**

Hon. Laura Taylor Swain  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**Re: United States v. Constantinescu, as to Cristian Ulmanu and**  
**19 Cr. 651 (LTS)**

Dear Judge Swain:

I, along with Christina Cooper, Esq., represent Cristian Ulmanu. Jill R. Shellow, Esq. represents Alin Hanes Calugaru.

We write with respect to our client and on behalf of Ms. Shellow with respect to her client, and with the consent of the Government, to request an adjournment for approximately 60 days of the conference scheduled for March 23, 2021. The parties are engaged in plea negotiations and continue to review newly-produced discovery.

We believe that it would make the most sense to adjourn the conference for approximately 60 days.

Both, Ms. Shellow and I consent to the exclusion of time pursuant to the Speedy Trial Act on behalf of our respective clients.

If the foregoing meets with the Court's approval, then we respectfully request that you "So Order" this letter.

Thank you for your consideration in, and attention to, this matter.

Respectfully,



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Cc: All parties (by ECF)

The application is granted. The conference is adjourned to May 18, 2021, at 11:00 a.m. The Court finds pursuant to 18 U.S.C. §3161(h)(7)(A) that the ends of justice served by an exclusion of the time from today's date through May 18, 2021, outweigh the best interests of the public and the defendant(s) in a speedy trial for the reasons stated above. DE#531 resolved.

SO ORDERED.

Dated: 3/10/2021

/s/ Laura Taylor Swain, USDJ